

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:	CASE NO.: 12-07143-ESL
MARIA DEL PILAR RODRIGUEZ LOPEZ	CHAPTER-13-
DEBTOR(S)	

REPLY TO TRUSTEE'S MOTION TO DISMISS

TO THE HONORABLE COURT:

COMES NOW DEBTOR(S), through the undersigned attorney and to this Honorable Court respectfully states and prays as follows:

1. On November 14, 2014, the Chapter 13 Trustee filed a motion to dismiss stating that debtor is in arrears equal to \$300.00 and that no tax refunds have been received.
2. On December 11, 2014 debtor submits 2012 and 2013 taxes to the Trustee through the Trustee's Upload Document Program (UDP). Debtor did not receive any tax refunds for the years 2012 and 2013 taxes
3. Debtor hereby respectfully submits evidence of financial summary which reflects that she is up to date with her monthly payments of the Chapter 13 Payment Plan.

WHEREFORE it is respectfully requested from this Honorable Court to take notice of the above stated situation and deny the Motion to Dismiss filed by the Chapter 13 Trustee.

CERTIFICATE OF SERVICE: I hereby certify that the foregoing motion has been filed with the Clerk of the court using the CM/ECF system that will electronically notify parties in interest and to Chapter 13, Alejandro Oliveras and US Trustee Office. Non CM/ECF participants that are interested parties will be notified by regular US Postal Service.

In Cayey, Puerto Rico this 11<sup>th</sup> day of December, 2014

/s/Miriam A. Murphy Lightbourn  
MIRIAM A. MURPHY LIGHTBOURN  
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## FINANCIAL SUMMARY - CASE 12-07143

MARIA DEL PILAR RODRIGUEZ LOPEZ paying \$300.00 MONTHLY

Receipts	Rcpts/Deb Refunds	Disbursements	Adjustments	Trustee Disb.	Trustee Adj.	Show All
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Limits: Select Start Date ▼ Select Claim ID ▼ Select Payee Name ▼ Check Status: ☒ Cleared ☐ Stale Dated ☐ Stop Payment ☐ Cancelled ☐ Voided ☐ Outstanding

10/16/2012	0653 00281 0090	LOCKBOX PAYMENT	\$300.00	
11/16/2012	0503 00500 3786	LOCKBOX PAYMENT	\$300.00	
12/18/2012	0502 00220 7717	LOCKBOX PAYMENT	\$300.00	
1/15/2013	0501 00310 0090	LOCKBOX PAYMENT	\$300.00	
2/21/2013	0500 00160 0090	LOCKBOX PAYMENT	\$300.00	
3/19/2013	0659 00161 0090	LOCKBOX PAYMENT	\$300.00	
4/18/2013	0655 00321 0090	LOCKBOX PAYMENT	\$300.00	
5/20/2013	0655 00201 0090	LOCKBOX PAYMENT	\$300.00	
6/19/2013	0654 00721 0090	LOCKBOX PAYMENT	\$300.00	
7/18/2013	0658 00181 0090	LOCKBOX PAYMENT	\$300.00	
8/19/2013	0656 00361 0090	LOCKBOX PAYMENT	\$300.00	
9/19/2013	0656 00441 0090	LOCKBOX PAYMENT	\$300.00	
10/18/2013	0658 00441 0090	LOCKBOX PAYMENT	\$300.00	
11/21/2013	0651 00521 9646	LOCKBOX PAYMENT	\$300.00	
12/19/2013	0655 00121 0090	LOCKBOX PAYMENT	\$300.00	
1/21/2014	0659 00141 0090	LOCKBOX PAYMENT	\$300.00	
2/21/2014	0654 00041 9762	LOCKBOX PAYMENT	\$300.00	
3/20/2014	0663 00181 0090	LOCKBOX PAYMENT	\$300.00	
4/15/2014	0651 00481 0090	LOCKBOX PAYMENT	\$300.00	
5/19/2014	0657 00441 0090	LOCKBOX PAYMENT	\$300.00	
6/30/2014	0500 00310 0090	LOCKBOX PAYMENT	\$300.00	
7/17/2014	0600 00141 0090	LOCKBOX PAYMENT	\$300.00	
8/19/2014	0651 00026 0090	LOCKBOX PAYMENT	\$300.00	
9/18/2014	0506 00007 0090	LOCKBOX PAYMENT	\$300.00	
10/20/2014	0714 86700 0003	LOCKBOX PAYMENT	\$300.00	
11/21/2014	0714 86706 0003	LOCKBOX PAYMENT	\$300.00	
Totals:			\$7,800.00	\$0.00